



March 10, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Dominion Energy South Carolina, Inc.'s Annual Update on Demand Side Management Programs and Petition to Update Rate Rider (*This Filing Includes a Request for a Rate Increase*)
Docket No. 2022-52-E

Dear Ms. Boyd:

On January 31, 2022, Dominion Energy South Carolina, Inc. ("DESC" or "Company") filed with the Public Service Commission of South Carolina ("Commission") in the above-referenced docket its Annual Update on Demand Side Management Programs and Petition to Update Rate Rider ("Original Update and Petition").

By this letter, DESC hereby files with the Commission an Amended Annual Update on Demand Side Management Programs and Petition to Update Rate Rider. In preparing discovery responses for the South Carolina Office of Regulatory Staff ("ORS"), the Company discovered that revisions to Exhibits 3, 5, 6, 7, 8, and 9 and corresponding revisions to Paragraphs 33, 35, 42, 43, 45, 46 (and associated table), 47, 48, 49, 50, and 52 of the filing were necessary. These amendments would lower the residential and small general service customer class factors previously submitted by DESC, and would not change the medium and large general service customer class factors.

For ease of reference, the amendments are as follows:

1. "Amended Exhibit 3" replaces "Exhibit 3."
2. Paragraph 33 was amended to reference "Amended Exhibit 3" instead of "Exhibit 3" and to reduce DESC's regulatory asset account balance of allowable DSM costs, as of November 30, 2021, from \$68,705,890 to \$68,458,257 and to reduce amortization costs associated with the Program Year 11 vintage from \$7,186,006 to \$7,101,210.
3. Paragraph 35 was amended to reduce the amount of DSM costs from \$39,377,247 to \$39,292,451.

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4. "Amended Exhibit 5" replaces "Exhibit 5."
5. Paragraph 42 was amended to reference to "Amended Exhibit 5" instead of "Exhibit 5."
6. "Amended Exhibit 6" replaces "Exhibit 6."
7. Paragraph 43 was amended to reference to "Amended Exhibit 6" instead of "Exhibit 6" and to reduce the allowable shared savings amortization amount from \$2,694,521 to \$2,678,655.
8. Paragraph 45 was amended to reduce the allowable shared savings amortization amount from \$2,694,521 to \$2,678,655.
9. "Amended Exhibit 7" replaces "Exhibit 7."
10. Paragraph 46 was amended to reference "Amended Exhibit 7" instead of "Exhibit 7," to reduce the total DSM costs for recovery from \$60,019,393 to \$59,918,731, to reduce the Proposed \$/kWh and Difference \$/kWh displayed in the table for Residential from \$0.00308 to \$0.00307 and from 0.00087 to \$0.00086 respectively, and to reduce the Proposed \$/kWh and Difference \$/kWh for Small General Service from \$0.00621 to \$0.00620 and from 0.00188 to \$0.00187 respectively.
11. Paragraph 47 was amended to reduce the Proposed \$/kWh for Residential from \$0.00308 to \$0.00307 and to reduce the increase in the bill of a residential customer using 1,000 kWh per month from \$0.87 to \$0.86.
12. Paragraph 48 was amended to reduce the hypothetical impact in the bill of a residential customer using 1,000 kWh per month from \$1.52 to \$1.51.
13. "Amended Exhibit 8" replaces "Exhibit 8."
14. Paragraph 49 was amended to reference to "Amended Exhibit 8" instead of "Exhibit 8."
15. Paragraph 50 was amended to reference to "Amended Exhibit 8" instead of "Exhibit 8."
16. "Amended Exhibit 9" replaces "Exhibit 9."
17. Paragraph 52 was amended to reference to "Amended Exhibit 9" instead of "Exhibit 9."

By copy of this letter, the Company is providing the South Carolina Office of Regulatory Staff a copy of the Amended Annual Update on Demand Side Management Programs and Petition to Update Rate Rider.

If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



Matthew W. Gissendanner

MWG/kms

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cc: Nicole M. Hair, Esquire
Christopher M. Huber, Esquire
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Dominion Energy South Carolina, Inc.
Annual Update on Demand Side
Management Programs and Petition to
Update Rider. *This filing includes a
request for a rate increase.*

Introduction

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approved shared savings incentive for investing in such programs, effective for bills rendered on and after the first billing cycle of May 2022.

In support of this petition, DESC would respectfully show to the Commission the following key facts and would request and petition the Commission for the following relief:

1. This matter comes before the Commission pursuant to S.C. Code Ann. § 58-37-20 and by Order No. 2010-472, as affirmed and modified by Order No. 2013-826 and Order No. 2019-880. In Order No. 2010-472, as affirmed and modified by Order No. 2013-826 and Order No. 2019-880, the Commission approved DESC's suite of DSM programs and authorized the Company to continue its DSM Rider. In accordance with § 58-37-20 and as described more fully below, the DSM Rider is designed to allow DESC to recover the costs and net lost revenues associated with its DSM programs along with a shared savings incentive.

2. In Order No. 2019-880, the Commission also ordered DESC to continue its practice established under Order No. 2010-472 and continued under Order No. 2013-826 of submitting an annual filing with the Commission updating the Company's DSM Rider each January through the life of the DSM programs.

3. In accordance with Order No. 2010-472, as affirmed and modified by Order No. 2013-826 and Order No. 2019-880, the annual filing must set forth the programs, net lost revenues, program costs, shared savings incentive, net program benefits, and other items as appropriate. Moreover, the annual filing must encompass the twelve-month period beginning December 1 and ending November 30.

4. For this annual filing, the prior review period is December 1, 2019, to November 30, 2020 (“Program Year 10”); the current review period is December 1, 2020, to November 30, 2021 (“Program Year 11”); and the forecasted period is December 1, 2021, to November 30, 2022 (“Program Year 12”).

Update on DSM Programs

5. In Order No. 2019-880, the Commission approved a suite of ten modified, expanded, and new DSM programs for development and implementation. At the end of Program Year 11, DESC was offering its customers ten (10) DSM Programs.

6. Exhibit 1 sets out the most significant aspects of program development and implementation approach for each of the approved programs, including next steps and modifications to the programs, as well as other pertinent information that occurred in Program Year 11 or will occur in Program Year 12.

Impact of COVID-19 Pandemic on DSM Programs

7. The ongoing 2019 Novel Coronavirus (“COVID-19”) pandemic continued to impact the Company’s DSM Programs. Throughout the year, DESC informed both the Commission and the DESC Energy Efficiency Advisory Group (“Advisory Group”) of the program impacts.

8. **Residential Home Energy Check-Up:** By letter dated March 12, 2020, in Docket No. 2019-239-E, DESC informed the Commission that it had temporarily suspended the Home Energy Check-Up program effective, Monday, March 16, 2020, due to the COVID-19 pandemic.

By letter dated June 23, 2020, in Docket No. 2019-239-E and Docket No. 2020-106-A, the Company informed the Commission that it had begun to offer its customers access to a free Virtual Home Energy Check-Up in place of its in-home energy efficiency consultation. This new, virtual service is performed by DESC's staff of energy experts to help customers identify opportunities to save energy. A variety of options are available to conduct the Virtual Home Energy Check-up including Facetime, Teams, and telephone (accompanied by email with photo attachments). DESC helps customers select the best way to optimize the experience. During the approximately hour-long consultation, a professionally trained member of the DESC energy team reviews a variety of measures to include windows and doors, caulking, weather-stripping, insulation levels, appliances, water heaters and heating and cooling systems.

The Virtual Home Energy Check-up consultation includes a custom report with recommendations to improve the home's energy usage, an overview of past energy usage, details on how weather affects energy consumption specifics on using thermostats efficiently, details on how the HVAC system works, information about other energy-saving programs offered by DESC, and a free Energy Efficient LED Bulb Kit delivered to customers.

By letter dated April 1, 2021, the Company informed the Commission that, as of April 1, 2021, the Company had resumed in-home energy efficiency consultations subject to appropriate COVID-19 safety precautions and that customers could elect either an in-home consultation or a virtual check-up.

By letter dated September 20, 2021, the Company informed the Commission that, as a result of the surge in COVID-19 cases associated with the Delta variant in South Carolina, it had temporarily suspended in-home energy consultations, but would continue offering its customers access to a free Virtual Home Energy Check-Up. By letter dated November 29, 2021, the Company informed the Commission that it was restarting in-home services for its Residential Home Energy Check-Up Tier 1 program effective December 1, 2021. As of the date of this filing, the Company continues to offer its customers the option to elect either an in-home consultation or a virtual check-up.

9. Residential Home Energy Check-up Tier 2: As discussed in DESC's April 3, 2020 letter referenced above, the Company informed the Commission that implementation of its Residential Home Energy Check-Up Tier 2, then scheduled for the June-July timeframe, might be delayed. Implementation of this new program, which provides residential customers with an incentive covering 75% of the costs for the installation of certain energy efficiency measurements, was in fact delayed. However, DESC began to implement it on a limited basis beginning in early October using COVID-19 precautions. In December 2020, DESC made the decision to suspend the Home Energy Check-Up Tier 2 due to the rising cases of COVID-19 in the state. By letter dated April 1, 2021, the Company informed the Commission that, as of April 1, 2021, the Company would fully implement Tier 2 subject to appropriate COVID-19 safety precautions.

10. **Multifamily:** By letter dated April 3, 2020, DESC informed the Commission that implementation of its Multifamily program, then scheduled for the June-July timeframe, might be delayed. Implementation of this new program, which provides for both in-unit (residential) and common area (nonresidential) energy efficiency upgrades at multifamily properties, was in fact delayed. However, DESC began limited implementation in late September 2020. Specifically, DESC implemented the nonresidential component of the program offering with an incentive equal to 75% of the cost for the upgrade of primarily lighting and heating and cooling equipment in common areas. In-unit installations were briefly initiated in December 2020 and then suspended due to COVID-19. By letter dated April 1, 2021, the Company informed the Commission that, as of March 8, 2021, the Company had begun to fully implement the Multifamily program (common areas and residential units) subject to appropriate COVID-19 safety precautions. By letter dated September 20, 2021, the Company informed the Commission that, as a result of the surge in COVID-19 cases associated with the Delta variant in South Carolina, it had temporarily suspended the residential component of the Multifamily program but would continue offering the nonresidential component of the program. By letter dated November 29, 2021, the Company informed the Commission that it was restarting in-home services for the residential component of its Multifamily program effective December 1, 2021.

11. **Residential Neighborhood Energy Efficiency Program (“NEEP”):** By the March 12, 2020 letter referenced above, DESC also informed the

Commission that it would temporarily suspend the NEEP as a result of the ongoing COVID-19 pandemic. By letter dated October 5, 2020, DESC informed the Commission that would begin distributing energy efficiency kits using COVID-19 precautions to low-income customers who qualify for NEEP but were unable to receive the in-home services. The energy efficiency kits contain five LED bulbs, a standard kitchen faucet aerator and information on DESC's portfolio of residential DSM programs. The in-home installations were briefly initiated in December 2020 and then suspended due to COVID-19; however, the kit distribution continued. By letter dated April 1, 2021, the Company informed the Commission that, as of March 22, 2021, the Company had resumed in-home services related to NEEP subject to appropriate COVID-19 safety precautions. By letter dated September 20, 2021, the Company informed the Commission that, as a result of the surge in COVID-19 cases associated with the Delta variant in South Carolina, it had temporarily suspended in-home services, but would continue to distribute the EE kits to qualifying low-income customers. By letter dated November 29, 2021, the Company informed the Commission that it was restarting in-home services for its NEEP effective December 1, 2021.

12. Commercial and Industrial ("C&I") Programs: Although the commercial and industrial programs were not suspended during Program Year 11, EnergyWise for Your Business and Small Business Energy Solutions experienced delays in project implementation related to supply chain delays and labor shortages among field personnel as a result of the ongoing impacts of the pandemic.

13. As a result of the suspensions and other delays associated with the COVID-19 pandemic set forth in Paragraphs 8 through 12 above, these programs experienced reduced participation during Program Year 11.

Actions Taken in Response to Commission Order No. 2021-295

14. By Order No. 2021-295 in Docket No. 2021-34-E, the Commission ordered the Company to (1) revisit the methodology used in establishing energy savings projections to ensure better alignment of actual energy savings with projections in the Company's future filings and (2) incorporate any necessary changes to improve the cost effectiveness of the Home Energy Check-Up Program.

15. In compliance with Order No. 2021-295, DESC plans to update the methods and backup data used to develop all future energy savings projections as part of the DSM Potential Study currently underway and expected to be completed in 2023. To ensure actual energy savings better align with future projections, the following activities will be completed. First, DESC working with Opinion Dynamics Corporation (“ODC”), DESC’s third-party program evaluator, will complete the market assessment to provide updated DSM Potential Study model inputs that are well-grounded in DESC’s customer base while also characterizing DESC’s entire market in terms of energy efficiency opportunities and barriers. This data will lead to more reliable estimates of penetration and saturation of energy-using equipment and building shell measures; identify market barriers and participation trends; and quantify the energy efficiency opportunities for key customer segments, end-uses or measures. Second, DESC working with its DSM Potential Study consultant, ICF

International (“ICF”), will establish a historical baseline from the most recent evaluation results as the reference starting point to which to compare future results that includes changes in customer behavior and the market changes that have occurred since the 2019 DSM Potential Study as well as the impacts of COVID. Third, DESC and ICF will ensure that any new measure and/or program and related forecasts are supported by evaluated data or heavily supported by program experience in a similar service territory. In summary, the combination of these activities should result in more consistency between the actuals and forecasted savings values.

16. With respect to the Home Energy Check-Up program, prior to the pandemic, the DESC DSM staff shared with the Advisory Group that the Home Energy Check-Up program was experiencing a decline in cost effectiveness and energy savings for two primary reasons: federal lighting standards and changes in customer behavior. Due to the Energy Security and Independence Act (EISA), federal standards have continued to shift lighting baselines from incandescent to halogen, significantly reducing savings year-over-year for the lighting measures across all of DESC’s residential programs. Based on evaluation results, it was determined that customer behaviors had changed, and the energy efficiency recommendations were less likely to be completed or measures installed when left behind. To address these issues, DESC took actions to increase the direct installation of higher energy savings measures (water heater blankets, kitchen faucet aerators and water heater pipe wrap). Additionally, DESC staff began increasing the

number of installed LED bulbs from 5 bulbs to an unlimited number of incandescent bulb replacements. The program was operating at full capacity (in-home visits with installations) for approximately five months of Program Year 11 and completed 2,060 in-home and virtual visits or 56% of the forecasted participation. However, due to ongoing COVID restrictions, the program fell short of meeting the forecast due to the limited availability of in-home services and is not expected to be cost effective in Program Year 11 for that primary reason. To improve Program Year 12 results, DESC began providing new direct install measures (LED outdoor lighting, smart power strips, shower timers) to be included with the existing measures offered. At this time, DESC is uncertain of the impacts COVID will have on Program Year 12 participation. Currently, the program is fully operational.

2020 DSM High Case Rapid Assessment

17. By Order No. 2020-832 in Docket No. 2019-226-E, the Commission determined that DESC shall “conduct a ‘rapid assessment’ of the cost-effectiveness and achievability of ramping up its current portfolio to achieve at least a 1% level of savings in the years 2022, 2023, and 2024,” and include the results of the rapid assessment in its Modified 2020 Integrated Resource Plan (“IRP”). Using input from its Advisory Group and working with consultant ICF, DESC completed the DSM High Case Rapid Assessment in less than 3 months (as compared to the 18 months for the comprehensive 2019 DSM Potential Study) and filed the assessment with the Modified 2020 IRP in February 2021. In a letter dated May 24, 2021, responding to comments of ORS and Joint Intervenors to the Modified 2020 IRP, DESC informed

the Commission that “unless informed otherwise, DESC will assume that the Commission wishes for it to aggressively pursue a 1% savings goal as set forth in the Rapid Assessment, while working to improve cost effectiveness in spite of these uncertainties and potential of increased costs to customers.” As such, the Program Year 12 (2022) forecast in Exhibit 1 includes the Rapid Assessment program modifications that meet the criteria for cost-effectiveness and achievability.

Most notably, Rapid Assessment program modifications expand the Home Energy Reports program to include 70% of eligible residential electric customers in the new opt-out program model and the NEEP participation doubles to more than 8,000 homes in Program Year 12. Other smaller program changes, like making the cool roofs measure prescriptive under EnergyWise for Your Business, will also be incorporated in the DSM portfolio.

Update on Energy Efficiency Advisory Group

18. By Order No. 2010-472, in Docket No. 2009-261-E, the Commission approved a General Settlement Agreement which provided for the establishment of the Advisory Group, the role of which is to consider and make recommendations to DESC with respect to efficiency potential studies, new program ideas, modifications to existing programs, outreach and education programs and funding, and Evaluation, Measurement and Valuation (“EM&V”) plans. The Advisory Group was required to meet three times during the first year and “no less than twice per year thereafter.” By Order No. 2013-826 in Docket No. 2013-208-E, the Commission directed DESC to maintain and continue the Advisory Group as it had been established and

implemented and to continue to meet no less than twice per year; and by Order No. 2019-880 in Docket No. 2019-239-E, the Commission found that the Advisory Group performs the functions required of it.

19. Members of the Advisory Group consist of representatives from the following organizations: the South Carolina Office of Regulatory Staff, the South Carolina Energy Office, the South Carolina Small Business Chamber of Commerce, the South Carolina Energy Users Committee, the South Carolina Office of Economic Opportunity, the South Carolina Association of Community Action Partnerships, the South Carolina Coastal Conservation League, the Southern Alliance for Clean Energy, and the Energy Futures Group.

20. DESC met with its Advisory Group five (5) times during Program Year 11 – January 19, 2021; April 27, 2021; August 17, 2021; October 26, 2021; and November 17, 2021. In between meetings, DESC provided program updates regarding the impacts of the pandemic as well as notice of its EM&V filing.

21. During the January 19, 2021 meeting, DESC's consultant, ICF, reviewed the preliminary findings of the DSM High Case Rapid Assessment required by Commission Order No. 2020-832 in Docket No. 2019-226-E. DESC captured input from the Advisory Group members and allowed members an additional week to provide input. ICF used the Advisory Group input to complete the Rapid Assessment for inclusion in DESC's Modified 2020 IRP, which was filed in February 2021.

22. During the April 27, 2021 meeting, a representative from ICF explained how the inputs from the Advisory Group were used in the Rapid Assessment and

provided the rationale for either using or not using specific inputs. The ICF representative also presented on the Rapid Assessment Impacts on Cost-Effectiveness. DESC staff reviewed all the requirements for its upcoming DSM Potential Study, the input it had already received from Advisory Group members and a proposed timeline for completion of the study. The meeting content also included a discussion on the continuing impacts of COVID-19 on program implementation and the DSM priorities for Program Year 12.

23. During the August 17, 2021 meeting, DESC provided updates on the status of COVID-19 impacts, updates on the DSM Potential Study, progress on Program Year 12 priorities and projected year-end forecasts. A representative from ODC, DESC's third-party program evaluator, reviewed the scope of work for the market characterization portion of the DSM Potential Study and reviewed the results of Program Year 10 EM&V. Advisory Group members provided input on the market study prior to the meeting.

24. During the October 26, 2021 meeting, DESC provided the Advisory Group with a preview of the Company's initial filing of Gas DSM programs. DESC and its consultant, Resource Innovations, reviewed the proposed suite of two (3) residential programs and one (1) commercial program to be filed with the Commission in November 2021.

25. On November 17, 2021, DESC provided the Advisory Group with updates on the continuing impact of COVID-19 on program implementation; updates on the DSM Potential Study activity; a review of Program Year 10 cost effectiveness;

a Program Year 11 year-end forecast and program updates; and a brief update on the Gas DSM filing. DESC also provided opportunity for members to provide input on the Company's plan to use a third-party facilitator for future Advisory Group meetings, using an engagement format similar to the Company's IRP Stakeholder Group. The goal is to increase engagement among all of the Advisory Group members and to better document all of the input and feedback during the DSM Potential Study process.

Customer Communication and Outreach

26. DESC engaged in numerous marketing and communications activities to promote customer participation in its DSM programs in Program Year 11. Customer communications is a shared initiative between DESC's DSM staff, the Company's internal marketing staff and DESC's third-party program implementers.

27. An annual customer marketing and communications plan is developed for residential programs directed at broad customer segments. The DESC website, bill inserts, bill messaging, news releases, contractor outreach, direct mail, e-mail, paid social media and internet radio advertising were the primary means of communication for the residential programs.

28. Nonresidential program marketing and communication strategies are developed in conjunction with DESC's third party C&I implementer. The primary communication channels include the DESC website, bill messaging, paid social media, news releases, direct mail, contractor emails and webinars, local chambers of commerce and industry associations. In the case of the Small Business Direct Install

program, door-to-door sales and customer testimonials play a significant role in encouraging program participation.

Evaluation, Measurement, and Verification

29. Pursuant to Order No. 2010-472 and Order No. 2013-826, EM&V results are due no later than six months after the end of a program year; this requirement continues under Order No. 2019-880.

30. On May 28, 2021, in Docket No. 2019-239-E, DESC filed with the Commission its Program Year 10 EM&V Report. In summary, DESC's DSM programs for Program Year 10 achieved net energy savings of 43,797 megawatt hours ("MWH") and net demand savings of 11.46 megawatts. Attached hereto as Exhibit 2 is a table summarizing the DSM portfolio savings levels for Program Year 10.

31. The Program Year 10 EM&V Report serves as the basis for the trued-up amounts reflected in DESC's net lost revenue amounts and shared savings incentive amounts set forth herein.

32. DESC anticipates that its EM&V report for Program Year 11 will be completed in May 2022. Information concerning the impact of DSM programs on energy savings and peak demand on DESC's system during Program Year 11 will be included in that EM&V Report.

DSM Costs

33. As of November 30, 2021, DESC's regulatory asset account balance of allowable DSM costs was \$68,458,257. Pursuant to Commission Order No. 2019-880, in Docket No. 2019-239-E, and consistent with ORS's recommendation in that docket

that program costs “be amortized over the life of the program, but for no more than three (3) years,” the Company is now tracking its program costs in vintage years. These costs are to be amortized over three years, with such amortization to be applied separately to Residential costs and to C&I costs for each program year. In Amended Exhibit 3, and consistent with the approach outlined in the Rebuttal Testimony of Allen W. Rooks in Docket No. 2019-239-E and adopted by the Commission in Order No. 2019-880, DESC is including amortization costs associated with the Program Year 1 - Program Year 9 vintage of \$26,777,809 (for year 3 of 3), amortization costs associated with the Program Year 10 vintage of \$5,413,432 (for year 2 of 3), and amortization costs associated with the Program Year 11 vintage of \$7,101,210 (for year 1 of 3).

34. Through November 30, 2019, DESC, pursuant to Order No. 2015-307, accrued carrying costs on the unrecovered balances using the rate of interest as of the first day of each month during the applicable period for the 10-year U.S. Government Treasury Note, as reported by the *Wall Street Journal*, either in its print edition or on its website, plus an all-in spread of 65 basis points (0.65 percentage points). Effective December 1, 2019, and pursuant to Order No. 2019-880, DESC is accruing carrying costs on the unrecovered balances using the Company’s weighted average cost of debt.

35. Accordingly, DESC respectfully requests authorization to update the DSM Rider to allow the Company the opportunity to recover \$39,292,451 in DSM costs during the twelve-month period effective for bills rendered on and after the first

billing cycle of May 2022 and ending with the last billing cycle of April 2023 (“Recovery Period”).

Net Lost Revenues

36. Exhibit 4 shows the calculation of the appropriate amount of net lost revenues to be recovered during the Recovery Period; that amount is \$17,947,625.

37. In accordance with Order No. 2010-472, as modified by Order No. 2013-826 and Order No. 2019-880, the Company has trued-up its net lost revenues for Program Year 10 pursuant to the Program Year 10 EM&V Report, and the results of the true-up for this time period are included in the net lost revenues calculation.

38. The amount of net lost revenues reported herein reflects (i) the actual energy savings for each DSM program during Program Year 10 (in accordance with Commission Order No. 2010-472, the Company reduced Program Year 10 energy savings by 1 month because the month of December 2019 was included in the Company’s recent rate case test year in Docket No. 2020-125-E), and the reduction in demand and MWH sales that were calculated to occur as a result; and (ii) the cumulative forecasted energy savings for each DSM program during the time period December 1, 2020, through November 30, 2022, and the reduction in demand and MWH sales that are calculated to occur as a result.

39. In summary, DESC’s net lost revenue amounts include the following:

- a. The trued-up amounts for Program Year 10, as required by Commission Order No. 2010-472, as affirmed and modified by Order No. 2013-826;

- b. The forecasted amounts for Program Year 11, which will be trued-up in the Company's January 2023 annual DSM filing; and
- c. The forecasted amounts for Program Year 12, which will be trued-up in the Company's January 2024 annual DSM filing.

40. Pursuant to Order No. 2013-826, and as affirmed by Order No. 2019-880, net lost revenues are limited to a rolling three (3) years.

41. Accordingly, DESC respectfully requests authorization to update the DSM Rider to allow the Company the opportunity to recover net lost revenues in the amount of \$17,947,625 during the Recovery Period.

Net Program Benefits

42. Amended Exhibit 5 shows the actual net program benefits for December 1, 2017, to November 30, 2018 ("Program Year 8"); December 1, 2018, to November 30, 2019 ("Program Year 9"); and Program Year 10. The exhibit also shows the forecasted net program benefits for Program Year 11 and Program Year 12.

Shared Savings Incentive

43. As shown on Amended Exhibit 6, the allowable shared savings amortization amount for the Company is \$2,678,655. DESC's shared saving incentive amount includes the following:

- a. The actual shared savings incentive amortization amount for Program Years 8 through 10, which have been trued-up in accordance with Commission Order No. 2010-472, as affirmed by Order No. 2013-826;
- b. The forecasted shared savings incentive amortization amount for Program Year 11, which was forecasted in accordance with Commission Order No. 2019-880, and will

be trued-up in the Company's January 2023 annual DSM filing.

- c. The forecasted shared savings incentive amortization amount for Program Year 12, which was forecasted in accordance with Commission Order No. 2019-880, and will be trued-up in the Company's January 2024 annual DSM filing.

44. Through Program Year 9, the shared savings incentive is equal to 6% of the customers' net benefits. In accordance with Order No. 2019-880, the shared savings incentive in Program Year 10 and thereafter is equal to 9.9% of the customers' net benefits as determined by the Total Resource Cost test.

45. Pursuant to Order No. 2010-472, as affirmed by Order No. 2013-826 and modified by Order No. 2019-880, the shared savings incentive is to be amortized over five years without interest or carrying costs added to the calculation of the DSM Rider. Accordingly, DESC respectfully requests authorization to update the DSM Rider to allow the Company the opportunity to recover its allowable shared savings amortization amount of \$2,678,655 during the Recovery Period.

DSM Rate Calculation and DSM Rider

46. Amended Exhibit 7 shows that the total amount to be recovered during the Recovery Period under the DSM Rider, if approved, is \$59,918,731. It also reflects the calculation of the billing factors for each customer class based on the appropriate billing units for that customer class. Based on those calculations, the appropriate billing factors applicable to DESC's retail electric customers effective for bills rendered on and after the first billing cycle of May 2022, if approved, would be as follows:

Customer Class	Proposed \$/kWh	Current \$/kWh	Difference \$/kWh
Residential	\$0.00307	\$0.00221	\$0.00086
Small General Service	\$0.00620	\$0.00433	\$0.00187
Medium General Service	\$0.00324	\$0.00277	\$0.00047
Large General Service	\$0.00145	\$0.00127	\$0.00018

47. Based upon the foregoing and if approved, the DSM Rider for a residential customer will increase from \$0.00221 to \$0.00307 per kilowatt-hour. As a result, the Company estimates that the DSM Rider will cause the bill of a residential customer using 1,000 kilowatt-hours per month to increase approximately \$0.86.

48. By way of information, the calculations to update the DSM Rider were based on the Commission-approved 2019 DSM Potential Study. Had the Company used forecasted energy savings and net benefits from Program Year 12 of the Rapid Assessment in its calculations to update its DSM Rider, DESC estimates that the bill of a residential customer using 1,000 kilowatt-hours per month would increase by approximately \$1.51.

49. Amended Exhibit 8 is the proposed updated DSM Rider to be implemented during the Recovery Period.

50. In Docket No. 2020-125-E, the Commission approved a revision to the Availability criteria of the Company's Rate 23 tariff, which removed the definition of an industrial customer from that tariff. As a result of this revision, a disconnect now exists between the revised Rate 23 tariff, which no longer defines industrial customers, and the reference to "Industrial customers as defined in Rate 23" in the

DSM Rider's opt-out provision. To eliminate this disconnect and avoid any customer confusion, the Company has revised the opt-opt provision in Amended Exhibit 8 to specifically include the definition of industrial customers that was previously included in the Rate 23 prior to the revisions approved in Docket No. 2020-125-E. Specifically, those customers classified in the major industrial group of manufacturing with 10-14 or 20-39 as the first two digits of the Standard Industrial Classification or 21 or 31-33 as the first two digits of the six-digit North American Industry Classification System remain eligible for the opt-out. This change is simply a clarification for the benefit of customers and does not alter the application or operation of the opt-out provision in the DSM Rider.

51. As a result of the elimination of Rate 21A in Docket No. 2020-125-E, the Company is also revising the DSM Rider to remove the reference to "Rate 21A – Experimental Program – General Service Time-of-Use Demand" from the "Medium General Service" definition on page 2 of the DSM Rider.

52. Amended Exhibit 9 is a redline version of the proposed updated DSM Rider reflecting these clarifying revisions.

53. All calculations contained in the attached exhibits are in accordance with the formulas, methodologies, and rate designs approved by the Commission in Order No. 2010-472, as affirmed and modified by Order No. 2013-826 and Order No. 2019-880.

Update on Opt-Out for Large Commercial and Industrial Accounts

54. At the close of Program Year 11, 378 large commercial and industrial accounts had opted-out of DESC's DSM programs. Retail electric sales associated with these accounts represent approximately 22% of DESC's retail electric load.

55. Pursuant to Order No. 2019-880, the "no opt-out" period, i.e., the period during which a customer must remain in the program after accepting DSM benefits, was reduced from five years to three years.

Tracking Found Revenues

56. In Order No. 2019-880, the Commission did not require the Company to include the found revenue adjustment in the DSM Rider approved for the five-year program period (Program Years 10-14). Instead, the Commission ordered the Company "to track found revenue for the purpose of offsetting lost revenue and include a final report on those findings at the conclusion of the next five-year review process with preliminary results to be included in each year's annual oversight review."

57. In compliance with Order No. 2019-880, the Company has evaluated found revenue based on the decision tree provided by ORS Witness George Evans in Docket No. 2019-239-E and determined that it did not have any found revenue in Program Year 11. Exhibit 10 is a copy of the Company's application of the Mr. Evans' found revenue decision tree.

DSM Potential Study

58. The Company's last DSM Potential Study was completed in 2019, and in Docket No. 2019-239-E, the Commission approved DESC's current portfolio of programs for five (5) years or through Program Year 14.

59. In Order No. 2019-880, in Docket No. 2019-239-E, the Commission stated its desire to "see more aggressive efforts in attaining increased efficiency in the future and encourages the Company to maximize cost effective gains in energy efficiency with a 1% goal or more of energy savings." To that end, the Commission ordered that the next DSM Potential Study must "evaluate the technical potential, economic potential, and maximum achievable potential for energy efficiency." The Commission further ordered that the next DSM Potential Study should "evaluate the concept of found revenue based on the data that has accumulated with analysis on whether reducing lost revenue by found revenue (while controlling for found revenue program costs) necessarily results in a utility recovering less than its net income absent its investment in DSM, and whether those results are consistent with the requirements of § 58-37-20."

60. In Order No. 2020-832, in Docket No. 2019-226-E, the Commission ordered DESC to "include [in its 2023 IRP] a comprehensive evaluation of the cost effectiveness and achievability of higher levels of savings, including savings levels of 1.25%, 1.5%, 1.75% and 2%." This comprehensive evaluation must consider substantive additions and modifications to the Company's existing DSM portfolio. The Commission further ordered that, in implementing this plan, DESC must work

with stakeholders, particularly the Advisory Group, and provide opportunities for iterative review, input, and feedback on the Company's analysis and subsequent portfolio development. The Commission further directed that DESC include in its 2023 IRP potential incentive options and best practices to achieve the modeled levels of DSM.

61. To meet the Commission's requirements for the 2023 IRP, DESC initiated a new DSM Potential Study in 2021 working in collaboration with its Advisory Group. A market characterization study was launched in August 2021 by DESC's third-party evaluator, ODC. The results of the market study will provide inputs to the forecasting and modeling phase of the DSM Potential Study, which will be conducted by consultant ICF. Members of the Advisory Group provided input into the scopes of work for both phases of the study. A representative from ICF will present to the Advisory Group on the scope of work for the forecasting and modeling phase during its February 2, 2022 meeting.

62. Consistent with the terms of Commission Order No. 2010-472 in Docket No. 2009-261-E, DESC will treat the costs associated with the DSM Potential Study as a program administrative cost subject to recovery under the DSM Rider in a future proceeding.

Request for Relief

Based upon the foregoing, DESC respectfully requests that the Commission (i) approve the proposed updates to the Company's DSM Rider as described herein and in the attached exhibits (to include the clarifications to the opt-out provision and the

applicable rates) to be effective for bills rendered on and after the first billing cycle of May 2022 and (ii) grant such further, different or other relief as may be warranted, just, reasonable and lawful.

[signature page following]

Respectfully submitted,



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Carolina, Inc.

March 10, 2022

Cayce, South Carolina

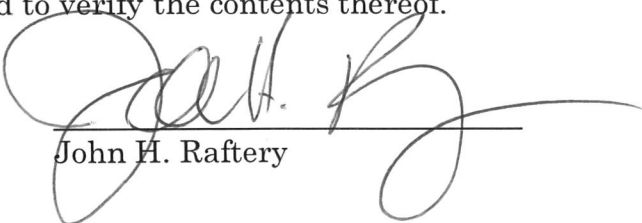
BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2022-52-E

IN RE:

Dominion Energy South Carolina, Inc.)
Annual Update on Demand Side)
Management Programs and Petition to)
Update Rider. *This filing includes a)
request for a rate increase.*)
_____)

VERIFICATION

PERSONALLY APPEARED before me, John H. Raftery, Director - Regulation for Dominion Energy South Carolina, Inc., who, being first duly sworn, deposes and says that he has read the foregoing Amended Annual Update on Demand Side Management Programs and Petition to Update Rider and that the matters alleged therein are true within his own knowledge; and that he is fully authorized and has capacity to sign the aforesaid pleading and to verify the contents thereof.



John H. Raftery

Sworn to before me this
10th day of March, 2022



Notary Public for South Carolina

My Commission Expires: 5-5-2031

**Demand Side Management Program Updates
November 30, 2021**

Exhibit
(page 1 of 5)

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	Residential	
	Home Energy Reports	Home Energy Check-up
General Overview	Program offers both a free monthly report and an energy portal. The monthly report provides information to help identify, analyze, and act upon potential energy efficiency measures and behaviors. Reports focus on both EE education and actions the customer can take to improve the energy efficiency of their home. The energy portal provides the customer the option to further engage with the program. The portal includes the following functionality: a home assessment survey; tailored energy tips that can be tracked over time; ability to review the impact the billing cycle, weather and temperature has on usage; ability to view daily usage and cost (smart meter customers) and a bill projection for current month (smart meter).	<u>Tier 1</u> - Free in-home visual energy assessment performed by DESC energy expert includes EE education that focuses on personalized report of customer's home and low cost/no cost recommendations/suggestions on ways to lower energy consumption. May also include installation of kitchen faucet aerator and water heater tank wrap and pipe insulation, as appropriate. <u>Tier 2</u> - HEC Plus focuses on building envelope installations. After completion of Tier 1, limited incentives may be offered to qualifying homes with higher than average electric usage. Installation of home shell measures may include air sealing, duct sealing and insulation, as appropriate. DESC provides incentive for 75% of the project costs.
Program Manager	Salem Parrott	Ginger Greenway
Launch Date	4/6/2011	Tier 1 - 10/1/2010; Tier 2 - 11/01/2020
Year 9 Program Actuals	37,335 participants 2,394 MWH, 0.90 MW reductions	3,651 participants 1,349 MWH, 0.21 MW reductions
Year 10 Program EM&V Actuals	34,712 participants 2,225 MWH, 0.83 MW reductions	1,704 participants 667 MWH, 0.10 MW reductions
Year 11 Program pre-EM&V Actuals	275,075 participants 19,043 MWH, 7.15 MW reductions	2,060 participants 1,556 MWH, 0.31 MW reductions
Year 12 Program Forecast	38,648 participants 2,676 MWH, 1.01 MW reductions <u>Rapid Assessment Forecast</u> 346,166 participants 52,271 MWH, 19.80 MW reductions	3,700 participants 5,650 MWH, 1.29 MW reductions <u>Rapid Assessment Forecast</u> no change
Implementation Approach	Under the opt-in model prior to PY11, customers were solicited via direct-mail and e-mail campaigns for program participation. Direct Options was the third-party implementer. Under the new opt-out model beginning in PY11, participants were automatically enrolled into the program but allowed to request opt-out of participating. Franklin Energy is the new program implementer. Customer service support provided by DESC Contact Center.	<u>Tier 1</u> - Visual in-home energy assessments provided by DESC staff who are Building Performance Institute (BPI) certified Building Analysts. Services are offered to single family structures, multi-family units and manufactured housing, regardless of homeownership. Virtual options include Facetime, Microsoft Teams and phone. Customer service support provided by DESC Contact Center. <u>Tier 2</u> - DESC staff determines customer eligibility following a Tier 1 assessment. Installation of home shell measures are completed by a subcontractor under third-party implementer, Honeywell.
Year 11 Program Activity	The HER program launched using an opt-out model in October 2021 with implementer Franklin Energy. HER participants were automatically enrolled in the program based on predetermined factors such as historical usage. Participants received a welcome letter and their first reports during the program launch. The program currently consists of monthly paper reports and an online energy portal. Distinct report templates have been created for the two cohorts: Neighbor Compare and Self Compare.	<u>Tier 1</u> - The program was only operating at full capacity (in-home with installations) approximately five months of the program year. Virtual Home Energy Check-ups continued as an option as a replacement for an in-home assessment. Marketing efforts included various outreach tactics including bill inserts and updated web content to promote the virtual offering along with the in-home service. As a result of ongoing COVID restrictions, the program fell short of meeting the forecast due to the limited availability of in-home services. <u>Tier 2</u> - This component officially launched in April 2021 with implementation provided by Honeywell working with their subcontractor, Attic & Crawlspace Solutions. Referrals are made by DESC from participants in the HEC-Tier 1 assessments. Activity was limited due to the ongoing impact of COVID.
Next Steps / Program Modifications	Beginning in PY12, the HER program will transition paper reports to email reports for participants that have an email on file. Portal alerts will also be launched for participants that have an email. Alerts will prompt participants to take action in the portal such as completing the Home Assessment. The alerts will also notify participants when a new report is available. HER will focus on enrolling up to 70% eligible participants while encouraging high participant engagement that translates into saved energy.	Overall, in PY12, the major focus for this program will be on improving its cost effectiveness by increasing the number of installed measures across both program components. <u>Tier 1</u> - Will continue to enhance and improve the virtual Home Energy Check-up, offer a hybrid Tier 1 visit (virtual visit followed by in-home installations with limited customer contact) and offer new direct install measures (LED outdoor lighting, smart powerstrips, shower timers) to be included with the existing measures offered. <u>Tier 2</u> - With steady implementation, this program component will focus on process improvements to expedite referrals and maintain a high conversion rate. At this time, DESC is uncertain of the impacts COVID will have on PY12 HEC participation for both Tier 1 and Tier 2.

**Demand Side Management Program Updates
November 30, 2021**

	Residential	
	Neighborhood Energy Efficiency Program (NEEP)	Appliance Recycling
General Overview	Provides income-qualified customers EE education, an in-home energy assessment and free, direct installation of low-cost energy saving measures. For customers who do not participate in the core program installations, EE kits are distributed. In addition to the core program installations, a subset of mobile home customers are receive the direct installation of weatherization measures.	Incentives for allowing DESC to collect and recycle less-efficient, but operable, secondary refrigerators, and/or standalone freezers, permanently removing the units from service. Units are recycled in compliance with EPA's Responsible Appliance Disposal (RAD) specifications using the best environmental practices available beyond what is required by federal law.
Program Manager	Gerald Freeman	Josh McMillin
Launch Date	7/30/2013	10/30/2014
Year 9 Program Actuals	3,607 participants 3,761 MWH, 0.40 MW reductions	3,283 measures 2,083 MWH, 0.25 MW reductions
Year 10 Program EM&V Actuals	1,883 (740 core, 1,143 kits) participants 952 MWH, 0.09 MW reductions	3,112 measures 1,924 MWH, 0.23 MW reductions
Year 11 Program pre-EM&V Actuals	6,836 (2,639 core, 4,197 kits) participants 4,653 MWH, 0.47 MW reductions	4,184 measures recycled 4,275 MWH, 0.49 MW reductions
Year 12 Program Forecast	4,355 participants 4,885 MWH, 0.56 MW reductions <u>Rapid Assessment Forecast</u> 8,710 participants 10,051 MWH, 1.14 MW reductions	4,253 measures 2,828 MWH, 0.34 MW reductions <u>Rapid Assessment Forecast</u> no change
Implementation Approach	Delivered to targeted neighborhoods where at least 50% of households have income levels \leq 200% of the poverty guideline as defined by the U.S. Dept. of Health and Human Services. Honeywell implements the program using a neighborhood sweep approach delivering energy efficiency education, an on-site energy survey and the direct installation of energy saving measures. Upon completing a neighborhood, EE kits are delivered to customers who did not participate in the core program. Homeowners and renters are eligible along with all housing stocks (SF, MF and mobile homes). A mobile homes subset receives weatherization measures based on the highest average energy users over the most recent 12-month period. Marketing is provided in-house by DESC. Customer service support is provided by the Honeywell Call Center.	DESC's third-party implementer, ARCA, handles inbound customer calls for scheduling, web scheduling, general questions, appliance pick-ups, full decommissioning and recycling services. DESC handles processing of rebate checks and marketing functions. All pick-ups are "no contact" and units may be left outdoors for pick-up, where possible.
Year 11 Program Activity	Neighborhoods in Columbia, Holly Hill, Vance, Eutawville, Aiken county and Hampton county participated in the program; however, the program was suspended Dec. 2020 - March 2021 and then suspended again in September 2021 due to the COVID-19 pandemic. All in-home installations ceased after September for the remainder of PY11. Prior to the September suspension, unlimited LEDs (standard and specialty bulbs to replace incandescent bulbs), digital wall plate thermometers and shower timers were added to the installed measures. Energy Efficiency kits (4,197) were distributed in towns/cities in the counties of Aiken, Richland, Barnwell, Orangeburg, Richland, Colleton, Allendale and Edgefield throughout the year to customers from previous neighborhoods who did not participate in the core program and to all PY11 customers who did not receive the full NEEP services. The kits contained 1 LED 40W equivalent, 3 LED 60 equivalents, 1 LED 100W equivalent, 1 kitchen faucet aerator and the DSM residential programs brochure.	Customers receive a "no contact" pick-up option -- indoors or outdoors. Implemented a strategic marketing plan including a \$100 double rebate promotion and a gift card give away. These promotions were advertised via bill inserts, paid social media and internet radio. Also recognized the customer who recycled the 20,000th unit through the program.
Next Steps / Program Modifications	Per the DSM High Case Rapid Assessment (and pending the impacts of COVID-19), NEEP will seek to double its forecasted participation in PY12. The following additional measures will be added to gain deeper energy savings: Air source heat pumps to replace electric baseboard and/or furnace heating, ENERGY STAR refrigerator replacements, weatherstripping (doors and windows) and door sweeps. The program will continue to include mobile homes participants with the installation of weatherization measures. NEEP will continue to deliver EE kits to neighborhoods once all efforts have been exhausted for them to participate in the core program.	Continue to review marketing analysis data and use a variety of channels to reach customers. The "no contact" outdoor pick-up option will continue to be offered along with the indoor option using appropriate COVID-19 safety precautions. Also continue to implement seasonal program promotions to increase participation.

**Demand Side Management Program Updates
November 30, 2021**

	Residential	
	Heating & Cooling	EnergyWise Savings Store formerly ENERGY STAR® Lighting
General Overview	Rebates to residential electric customers for the purchase of new ENERGY STAR® qualified HVAC equipment and heat pump water heaters that replaces older inefficient equipment. Additionally, incentives to encourage customers to improve the efficiency of existing AC and heat pump systems through duct improvements.	Online platform that incentivizes residential customers to purchase and install high-efficiency ENERGY STAR® LED lighting products, advanced power strips, smart thermostats, smart products and water conservation measures.
Program Manager	Josh McMillin	Salem Parrott
Launch Date	3/1/2011	2/14/2011
Year 9 Program Actuals	5,446 measures 3,267 MWH, 2.27 MW reductions	212,013 lighting products via online store & business offices 4,977 MWH, 0.46 MW reductions
Year 10 Program EM&V Actuals	6,464 measures 4,058 MWH, 2.76 MW reductions	110,817 lighting products via online store only 4,984 MWH, 0.80 MW reductions
Year 11 Program pre-EM&V Actuals	6,603 measures 5,764 MWH, 3.9 MW reductions	135,879 lighting products via online store 7,642 MWH, 1.11 MW reductions
Year 12 Program Forecast	6,610 measures 6,827 MWH, 3.71 MW reductions <u>Rapid Assessment Forecast</u> no change	118,980 lighting products via online store only 6,503 MWH, 0.53 MW reductions <u>Rapid Assessment Forecast</u> no change
Implementation Approach	Services delivered via a network of independent contractors. Contractors may receive specialized training from DESC and ICF, when possible. ICF technical training includes Manual J, Manual D, energy code (IECC), proper duct sealing and duct blaster testing. Customer service support and marketing functions handled by DESC.	DESC residential electric customers purchase select ENERGY STAR® LED lighting products, smart products, advanced power strips and water conservation products at deep discounts through an online store. The online store provides customer education regarding lighting and energy savings. In 2020, the program transitioned to a new implementer, AM Conservation Group, located in South Carolina. AM Conservation Group also provides customer service support for the online store, including the option to place an order by phone.
Year 11 Program Activity	A \$750 heat pump water heater rebate was added for customers who replace an old electric water heater. Additionally, a \$650 rebate was added for customers who replace an electric furnace with an Energy Star rated heat pump. Quarterly newsletters to HVAC and duct work contractors were sent via email and included program updates and rebate assistance. Residential bill inserts were mailed throughout the year. Paid social media and internet radio were used to promote the program. Consistent marketing efforts and program modifications have helped to support significant increase in customer participation over past few years.	Marketed three major campaigns throughout the year: two 30% off promotions (Spring and Summer) and 50% off promotion in the Fall. Increased direct mail during the campaigns from 150,000 to 300,000. Direct mailed 5-bulb lighting kits in the Spring and Summer to ~2,500 low income customers to promote energy savings. Continued with monthly social media campaigns, radio campaigns (Pandora and Spotify) and bill insert campaigns to increase program awareness and to promote monthly manufacturing promotions. Started an educational blog on the online store that is marketed by Facebook campaigns.
Next Steps / Program Modifications	Continue to promote the program and provide educational training to improve overall contractor knowledge, engage industry associations to enhance outreach and continue to increase program awareness to customers. Increase engagement with plumbers to promote the HPWH rebate and with HVAC contractors who focus on transitioning electric resistance furnaces to heat pumps. Investigate options for direct mail to targeted neighborhoods with older homes.	Continue monthly promotions on social media, radio and bill insert campaigns to promote program awareness and promotional offers. Spring 40% off campaign and summer water saving promotion planned. Testing educational blogs during shorter promotional periods and using social media to link back to store. In addition, will target low income customers for free 5-bulb kit. Monthly manufacturing and Simply Conserve promotions will continue throughout the year. Researching new products to offer to increase participation and energy savings.

**Demand Side Management Program Updates
November 30, 2021**

	Residential/Commercial	Commercial and Industrial
	Multifamily	Municipal LED Lighting
General Overview	Provides energy education, an on-site energy survey of the dwelling, and direct installation of select energy-saving measures specific to multifamily customers. In addition, energy efficiency measures will be recommended for common areas to include HVAC upgrades, LED lamps and/or fixtures and water conservation measures which will result in incentives for property owners. DESC pays 75% of the common area upgrades and 100% of the in-unit residential upgrades.	Incentives will allow for a financial neutral option for municipalities (Rate 17 customers) to convert from older, inefficient technology to LED lighting while improving lighting performance, providing remote monitoring, outage communications/control, faster repair response times and better overall customer experience.
Program Manager	Gerald Freeman	Sheryl Shelton / Justin Taylor
Launch Date	11/1/2020	5/1/2020
Year 9 Program Actuals	—	—
Year 10 Program EM&V Actuals	1 Common area MWH, 0.001 MW reductions	4 —
Year 11 Program pre-EM&V Actuals	1,524 units/participants, 6 Common Areas 1,556 MWH, 0.22 MW reductions	8,142 lighting fixtures 3,928 MWH, 0.00 MW reductions
Year 12 Program Forecast	1,909 units/participants, 510 Common Areas 3,992 MWH, 0.61 MW reductions <u>Rapid Assessment Forecast</u> no change	4,558 lighting fixtures 3,876 MWH, 0.00 MW reductions <u>Rapid Assessment Forecast</u> 8,558 lighting fixtures 7,278 MWH, 0.00 MW reductions
Implementation Approach	Implemented by Honeywell and their sub-contractor for HVAC upgrades in common areas. Customer service handled by Honeywell and marketing functions handled by DESC.	Outreach and installation to date has been completed by internal DESC Lighting staff and supported by DESC Governmental Affairs department. Marketing flyer created with general program overview and contact information to be used at municipal meetings.
Year 11 Program Activity	Solicited approximately 20 properties in Columbia and Charleston for participation in the program. Because of COVID-19, the residential portion of program implementation was delayed until March 2021 and then suspended once again in September 2021 for the remainder of PY11. Additional measures (HVAC filters and Smart Power Strips) were added. DESC completed 6 multifamily common area projects in PY11.	DESC continued working with municipalities in the service territory to discuss replacing all street lights with high efficiency LED street lights. During PY11, 44 outreach and program presentations were completed with municipalities, 39 contracts were signed and 16 projects were completed.
Next Steps / Program Modifications	Continue to solicit properties for participation in the program by sharing cost and energy savings benefits to property managers/owners. Work toward generating a project pipeline to achieve PY12 forecast.	In PY12, activities will include expanding the program to include 7,000 additional eligible fixtures for upgrade. DESC staff will continue installations and use installation vendors as the program expands across its service territory.

Demand Side Management Program Updates November 30, 2021

	Commercial and Industrial	
	EnergyWise For Your Business Program	Small Business Energy Solutions Program
General Overview	Incentives to non-residential customers to become more energy efficient. Incentives include retrofit lighting, new construction lighting, HVAC unitary, HVAC chillers, HVAC variable frequency drives, food service and refrigeration equipment, custom, building tune-up and technical services.	Provides cost-effective, comprehensive retrofit services (lighting, refrigeration, HVAC) to small business customers on a turnkey basis. The program identifies cost-effective efficiency retrofit opportunities and provides the direct installation of measures, financial incentives and other strategies to encourage replacement of existing equipment with high efficiency alternatives.
Program Manager	Annika Goodson	Annika Goodson
Launch Date	10/1/2010	11/24/2014
Year 9 Program Actuals	606 participants, 29,212 MWH, 5.29 MW reductions	781 participants, 7,211 MWH, 2.60 MW reductions
Year 10 Program EM&V Actuals	428 projects, 22,251 MWH, 4.42 MW reductions	754 projects, 6,731 MWH, 2.23 MW reductions
Year 11 Program pre-EM&V Actuals	390 projects, 28,455 MWH, 5.85 MW reductions	997 projects, 10,884 MWH, 2.54 MW reductions
Year 12 Program Forecast	947 projects, 54,292 MWH, 12.19 MW reductions <u>Rapid Assessment Forecast</u> 947 projects, 54,565 MWH, 12.25 MW	928 projects, 15,546 MWH, 4.47 MW reductions <u>Rapid Assessment Forecast</u> no change
Implementation Approach	Third-party implementer, ICF, provides technical assistance to customers, trade allies and field services support. Customer Service support provided by DESC DSM Staff.	Third-party implementer, ICF, provides technical assistance to customers and trade allies and field services support. ICF and subcontractors Facility Solutions Group (FSG), National Resource Management (NRM) and LED Lowcountry coordinate direct install services with local contractors. Customer Service support provided by DESC DSM Staff.
Year 11 Program Activity	The program added three new program components: Agricultural Custom Measures, Prescriptive Cool Roof Measure and Strategic Energy Management (SEM). Program incentive cap increased to \$100,000 per project type, per customer tax ID, per program year. Outreach tactics in PY11 included contractor and customer engagement through monthly webinar training, e-newsletters, involvement with local trade associations and chambers of commerce, and utilizing analytics to target specific sectors such as municipalities, universities, school systems, and hospitals.	The program added HVAC audits and measures including tune-ups, duct improvements and smart thermostats. Increased outreach to promote program awareness through business associations/organizations, chambers of commerce and direct mail campaigns. Added an additional lighting subcontractor, LED Lowcountry.
Next Steps / Program Modifications	Continue PY11 outreach tactics throughout PY12. Additional strategies to increase program awareness and participation include limited time offers for additional incentives, one-on-one engagement with distributors and increased collaboration between DESC and ICF Key Account Managers.	Continue to increase program awareness through business associations/organizations, chambers of commerce and monthly direct mail campaigns.

PY10 Portfolio Net Savings, Program Costs and Participation

Program Name	Net Savings				Program Costs		Participation		
	MWH Actual	% of Forecast	MW Actual	% of Forecast	Actual	% of Forecast	Actual	% of Forecast	Definition
EnergyWise for Your Business	22,250.59	60%	4.42	50%	\$4,321,733	54%	428	48%	Projects
Small Business Energy Solutions	6,731.27	77%	2.23	90%	\$3,052,049	186%	754	111%	Projects
EnergyWise Savings Store	4,983.74	92%	0.80	163%	\$1,104,854	215%	110,817	98%	Products
Heating & Cooling	4,057.63	76%	2.76	80%	\$3,076,380	99%	6,464	116%	Measures
Appliance Recycling	1,924.44	66%	0.23	66%	\$662,221	65%	3,112	71%	Appliances
Home Energy Reports	2,225.39	85%	0.83	84%	\$395,400	85%	34,712	92%	Customers / Households
Home Energy Check-Up	666.59	13%	0.10	12%	\$947,990	37%	1704	47%	Customers
Neighborhood Energy Efficiency	952.43	19%	0.09	16%	\$386,013	40%	1883	44%	Customers
Multifamily	4.44	0%	0.00	0%	\$100,028	12%	1	0%	Projects
Municipal LED Lighting	-	0%	-	0%	\$158,044	5%	0	0%	Measures
Total	43,796.52	56%	11.46	63%	\$14,204,712	64%	159,875	92%	N/A

Dominion Energy South Carolina
Amortization of Program Costs for DSM Rate Calculation

Customer Class	PY1 - PY9 Program Costs Amortization (Year 3)	PY10 Program Costs Amortization (Year 2)	PY11 Program Costs Amortization (Year 1)	Program Costs Amortization for Rate Calculation
Residential	\$ 12,652,550	\$ 2,544,185	\$ 3,530,487	\$ 18,727,222
Small General Service	\$ 7,174,219	\$ 2,093,689	\$ 2,884,430	\$ 12,152,338
Medium General Service	\$ 3,503,064	\$ 450,472	\$ 376,354	\$ 4,329,890
Large General Service	\$ 3,447,976	\$ 325,086	\$ 309,939	\$ 4,083,001
TOTAL	\$ 26,777,809	\$ 5,413,432	\$ 7,101,210	\$ 39,292,451

Dominion Energy South Carolina
Projection and True-Up of Net Lost Revenues for DSM Rate Calculation
From December 2019 - November 2022

Customer Class	Cumulative Energy Savings (in KWH) ¹	Net Lost Revenue Factors (\$ per KWH)	Estimated Net Lost Revenues for Recovery in Next Rate Period	Program Year Ten True-Up Amount as Detailed Below ²	Net Lost Revenues for Rate Calculation
Residential	78,899,105	\$0.09687	\$ 7,642,956	\$ (1,421,778)	\$ 6,221,178
Small General Service	111,809,412	\$0.08867	\$ 9,914,141	\$ (217,619)	\$ 9,696,522
Medium General Service	27,210,528	\$0.06635	\$ 1,805,419	\$ (427,062)	\$ 1,378,357
Large General Service	24,171,765	\$0.03969	\$ 959,377	\$ (307,809)	\$ 651,568
			\$ 20,321,893	\$ (2,374,268)	\$ 17,947,625

Notes:

¹ Cumulative Energy Savings are actual for Program Year Ten (December 2019 - November 2020) per EM&V results, and projected for Program Years Eleven & Twelve (through November 30, 2022). Only 11 months of Program Year Ten Savings are applied, in accordance with Commission Order No. 2010-472.

² Detailed calculation of the True-Up for Program Year Ten:

Customer Class	Actual Energy Savings (in KWH) from EM&V Study	Net Lost Revenue Factors (\$ per KWH)	Net Lost Revenue Incurred	Net Lost Revenue Collected from Customers	Calculated True-Up
Residential	14,814,660	\$0.09488	\$ 1,405,615	\$ 2,827,393	\$ (1,421,778)
Small General Service	21,148,063	\$0.08633	\$ 1,825,712	\$ 2,043,331	\$ (217,619)
Medium General Service	4,550,152	\$0.06257	\$ 284,703	\$ 711,765	\$ (427,062)
Large General Service	3,283,645	\$0.03722	\$ 122,217	\$ 430,026	\$ (307,809)

	PY8 - PY12 Net Benefits				
Residential	Actuals PY8	Actuals PY9	PY10 Actuals	PY11 Forecasted	PY12 Forecasted
Home Energy Reports	\$ (9,488)	\$ 37,219	\$ (220,270)	\$ 35,901	\$ 36,375
Energy Information Displays	\$ -		\$ -	\$ -	
Home Energy Check-Up	\$ (290,857)	\$ (314,977)	\$ (238,911)	\$ (63,547)	\$ (56,024)
Home Performance w ENERGY STAR	\$ -	\$ -	\$ -	\$ -	
ENERGY STAR Lighting	\$ 1,621,385	\$ 1,615,679	\$ 9,323,100	\$ 7,054,743	\$ 7,333,659
Heating & Cooling Program	\$ 2,344,197	\$ 2,380,913	\$ 517,251	\$ 734,619	\$ 388,452
ENERGY STAR New Homes	\$ -	\$ -	\$ -	\$ -	
Neighborhood Energy Efficiency Program	\$ 88,295	\$ (25,587)	\$ 754,250	\$ 3,183,799	\$ 3,264,736
Appliance Recycling	\$ 208,347	\$ 181,497	\$ (18,786)	\$ 43,954	\$ 44,035
Multifamily	\$ -		\$ (91,780)	\$ 1,083,777	\$ 1,107,693
	\$ 3,961,879	\$ 3,874,745	\$ 10,024,855	\$ 12,073,246	\$ 12,118,925

Commercial and Industrial	Actuals PY8	Actuals PY9	PY10 Actuals	PY11 Forecasted	PY12 Forecasted
EnergyWise for Your Business	17,533,372	14,676,854	14,648,644	14,449,270	16,572,990
Small Business Direct Install	2,196,868	3,460,186	804,786	1,848,512	2,304,815
Municipal LED Lighting	-	-	(158,044)	5,626,631	5,063,968
	\$ 19,730,240	\$ 18,137,041	\$ 15,295,385	\$ 21,924,413	\$ 23,941,772

All DSM Programs	\$ 23,692,119	\$ 22,011,786	\$ 25,320,240	\$ 33,997,658	\$ 36,060,697
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Dominion Energy South Carolina
Projection and True-Up of Shared Savings Incentive
for DSM Rate Calculation
Through November 2022

Customer Class	Cumulative Shared Savings Amortization for Program Years Eight Through Twelve	Shared Savings Amortization True-Up Amount from Tenth Program Year ¹	Shared Savings Amortization for Rate Calculation
Residential	\$ 771,537	\$ (5,810)	\$ 765,727
Small General Service	\$ 1,143,092	\$ 169,357	\$ 1,312,449
Medium General Service	\$ 298,540	\$ 64,576	\$ 363,116
Large General Service	\$ 223,775	\$ 13,588	\$ 237,363
Totals:	\$ 2,436,944	\$ 241,711	\$ 2,678,655

Notes:

¹ Detailed Calculation of Program Year Ten (December 2019 - November 2020) True-Up:

Customer Class	Actual Shared Savings Amortization (per EM&V Study)	Shared Savings Amortization Collected From Customers - Program Year Ten	Calculated True-Up Applicable to Program Year Ten
Residential	\$ 442,192	\$ 448,002	\$ (5,810)
Small General Service	\$ 757,084	\$ 587,727	\$ 169,357
Medium General Service	\$ 234,785	\$ 170,209	\$ 64,576
Large General Service	\$ 133,735	\$ 120,147	\$ 13,588

Dominion Energy South Carolina
DSM Rate Calculation
(For the Recovery Period of May 2022 - April 2023)

Exhibit No.	Description	Total	Customer Class			
			Residential	Small General Service	Medium General Service	Large General Service
3	Amortization of Program Costs	\$ 39,292,451	\$ 18,727,222	\$ 12,152,338	\$ 4,329,890	\$ 4,083,001
4	Estimated Net Lost Revenues	\$ 17,947,625	\$ 6,221,178	\$ 9,696,522	\$ 1,378,357	\$ 651,568
6	Shared Savings Incentive	\$ 2,678,655	\$ 765,727	\$ 1,312,449	\$ 363,116	\$ 237,363
	Total DSM Costs for Recovery	\$ 59,918,731	\$ 25,714,127	\$ 23,161,309	\$ 6,071,363	\$ 4,971,932
	Projected Class Sales (in GWH) during the Recovery Period ¹		8,375.1	3,733.0	1,874.4	3,426.5
	Rate per KWH		\$ 0.00307	\$ 0.00620	\$ 0.00324	\$ 0.00145

Notes:

¹ Projected Class Sales are for the Recovery Period of May 2022 - April 2023 and are adjusted to account for those customers who have opted-out of DESC's DSM programs.

DOMINION ENERGY SOUTH CAROLINA, INC.

ELECTRICITY

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APPLICABILITY

Service supplied under the Company's retail electric rate schedules is subject to approved Demand Side Management (DSM) program cost adjustments. The rates shown below are applicable to and a part of the Company's South Carolina retail electric rate schedules and included in the monthly rate provision of the applicable schedule used in billing and shall therefore be added to customer's monthly bill statement:

DSM RATES BY CLASS (\$/kWh)

Customer Class	DSM Factors
Residential	0.00307
Small General Service	0.00620
Medium General Service	0.00324
Large General Service	0.00145

DERIVATION OF FACTORS

Demand Side Management costs to be recovered in an amount rounded to the nearest one-thousandth of a cent per kilowatt-hour will be determined by the following formula:

$$A = D / S$$

A = Customer Class Specific DSM Program Costs Rate Adjustment per kilowatt-hour applied to base rates rounded to the nearest one-thousandth of a cent.

D = DSM revenue requirement for the period calculated as (C + L + R)

Where:

C = One year of Amortization Expense (based upon the balance of DSM Program Costs at the beginning of the annual review period) plus associated Carrying Costs (calculated using the Company's Weighted Average Cost of Debt)

L = Net Lost Revenues for each customer class are based on forecasted retail kWh sales reductions attributable to DSM programs. Revenues lost are calculated using the average rate per customer class less the class specific fuel component and variable O&M. The resulting factor is then multiplied by the kWh sales lost for each class of customers. This amount will be "trued-up" for the actual impact on prior year sales. The total amount of net lost revenues is limited to a rolling three (3) year period.

R = One year of amortization of DSM Program Incentive to be calculated by multiplying the estimated Net Present Value Benefit of each energy efficiency program as determined by the Total Resource Cost Test times 9.9%.

S = Projected customer class specific sales, defined as retail kilowatt-hour sales from each class of customers for the current period, less sales from customers who have been approved for opt-out status.

The appropriate revenue-related tax factor is to be included in these calculations.

"OPT-OUT" PROVISION

1. Industrial customers classified in the major industrial group of manufacturing with 10-14 or 20-39 as the first two digits of the Standard Industrial Classification or 21 or 31-33 as the first two digits of the six digit North American Industry Classification System are eligible to opt-out of DSM programs and costs.
2. Non-residential accounts that have both (i) annual consumption of 1,000,000 kilowatt-hours or greater in the billing months of the prior calendar year and (ii) 52-59 as the first two digits of their Standard Industrial Classification or 44-45 as the first two digits of their six digit North American Industry Classification System are also eligible to opt-out of the DSM programs and costs.

DOMINION ENERGY SOUTH CAROLINA, INC.

ELECTRICITY

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3. If a customer elects to opt out an eligible non-residential account, all other non-residential accounts which are billed to the same customer and located on the same or contiguous properties are also eligible for the opt-out. A customer may not aggregate accounts at separate locations to achieve the eligibility threshold of 1,000,000 kilowatt-hours.
4. Customers wishing to opt-out of DSM programs and recovery of DSM costs shall file a writing with the Company on a form provided by the Company representing that they have already implemented or will be implementing alternative DSM programs. Certifications shall be valid until withdrawn. If a Customer should choose to participate in one or more DSM programs for any account prior to or after the issuance of Commission Order No. 2013-826, then such Customer will not be permitted to opt-out of DSM programs and recovery of DSM costs for that account(s) for a period of three (3) years from the date the Customer accepts a DSM rebate from the Company.
5. Customers who opt-out but later elect to participate in one of the Company's programs may do so upon application to the Company. If acceptable to the Company, the Customer may participate in the Company's programs for any account(s), but may not apply to opt-out for that account(s) again for a period of three (3) years from the date the Customer accepts a DSM rebate from the Company.

Since DSM charges are included and a part of retail rates, customers qualifying for the opt-out provision shall receive the following DSM Credit on their monthly bill statement:

$$\text{DSM Credit} = \text{Billed kWh times the applicable DSM Rate}^*$$

* The DSM Rate shall be as shown in the above table for the schedule applicable to Customer's monthly bill.

DEFINITIONS

1. Annual Review Period - The period of time between December 1 and November 30.
2. Amortization Period - The period of time which the Company's DSM measures, program costs and incentive are deferred and amortized.
3. Customer Class - The Company's classification of customers based on similar energy usage characteristics. These are defined as follows:

Residential:

Rate 1 – Good Cents Rate, Rate 2 – Low Use Residential Service, Rate 5 - Residential Service Time-of-Use, Rate 6 – Energy Saver / Conservation Rate, Rate 7 – Residential Service Time-Of-Use Demand, Rate 8 – Residential Service

Small General Service:

Rate 3 – Municipal Power Service, Rate 9 – General Service, Rate 10 – Small Construction Service, Rate 11 – Irrigation Service, Rate 12 – Church Service, Rate 13 – Municipal Lighting Service, Rate 14 – Farm Service, Rate 16 – General Service Time-Of-Use, Rate 22 – School Service, Rate 28 (Experimental) – Small General Service Time-Of-Use Demand

Medium General Service:

Rate 15 - Supplementary and Standby Service, Rate 20 – Medium General Service, Rate 21 – General Service Time-Of-Use Demand

Large General Service:

Rate 23 – Industrial Power Service, Rate 24 – Large General Service Time-Of-Use, Rate 27 - Large Power Service Real Time Pricing (Experimental)

SALES AND FRANCHISE TAX

To the above will be added any applicable sales tax, franchise fee or business license tax which may be assessed by any state or local governmental body.

PAYMENT TERMS

All bills are net and payable when rendered.

TERM OF CONTRACT

The contract terms will be the same as those incorporated in the rate tariff under which customer receives electric service.

GENERAL TERMS AND CONDITIONS

The Company's General Terms and Conditions are incorporated by reference and form a part of this rider.

DOMINION ENERGY SOUTH CAROLINA, INC.

ELECTRICITY

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DEMAND SIDE MANAGEMENT COMPONENT

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APPLICABILITY

Service supplied under the Company's retail electric rate schedules is subject to approved Demand Side Management (DSM) program cost adjustments. The rates shown below are applicable to and a part of the Company's South Carolina retail electric rate schedules and included in the monthly rate provision of the applicable schedule used in billing and shall therefore be added to customer's monthly bill statement:

DSM RATES BY CLASS (\$/kWh)

Customer Class	DSM Factors
Residential	0.00307
Small General Service	0.00620
Medium General Service	0.00324
Large General Service	0.00145

DERIVATION OF FACTORS

Demand Side Management costs to be recovered in an amount rounded to the nearest one-thousandth of a cent per kilowatt-hour will be determined by the following formula:

$$A = D / S$$

A = Customer Class Specific DSM Program Costs Rate Adjustment per kilowatt-hour applied to base rates rounded to the nearest one-thousandth of a cent.

D = DSM revenue requirement for the period calculated as (C + L + R)

Where:

C = One year of Amortization Expense (based upon the balance of DSM Program Costs at the beginning of the annual review period) plus associated Carrying Costs (calculated using the Company's Weighted Average Cost of Debt)

L = Net Lost Revenues for each customer class are based on forecasted retail kWh sales reductions attributable to DSM programs. Revenues lost are calculated using the average rate per customer class less the class specific fuel component and variable O&M. The resulting factor is then multiplied by the kWh sales lost for each class of customers. This amount will be "trued-up" for the actual impact on prior year sales. The total amount of net lost revenues is limited to a rolling three (3) year period.

R = One year of amortization of DSM Program Incentive to be calculated by multiplying the estimated Net Present Value Benefit of each energy efficiency program as determined by the Total Resource Cost Test times 9.9%.

S = Projected customer class specific sales, defined as retail kilowatt-hour sales from each class of customers for the current period, less sales from customers who have been approved for opt-out status.

The appropriate revenue-related tax factor is to be included in these calculations.

"OPT-OUT" PROVISION

1. Industrial customers **classified in the major industrial group of manufacturing with 10-14 or 20-39 as the first two digits of the Standard Industrial Classification or 21 or 31-33 as the first two digits of the six digit North American Industry Classification System as defined in Rate-23** are eligible to opt-out of DSM programs and costs.
2. Non-residential accounts that have both (i) annual consumption of 1,000,000 kilowatt-hours or greater in the billing months of the prior calendar year and (ii) 52-59 as the first two digits of their Standard Industrial Classification or 44-45 as the first two digits of their six digit North American Industry Classification System are also eligible to opt-out of the DSM programs and costs.

DOMINION ENERGY SOUTH CAROLINA, INC.

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3. If a customer elects to opt out an eligible non-residential account, all other non-residential accounts which are billed to the same customer and located on the same or contiguous properties are also eligible for the opt-out. A customer may not aggregate accounts at separate locations to achieve the eligibility threshold of 1,000,000 kilowatt-hours.
4. Customers wishing to opt-out of DSM programs and recovery of DSM costs shall file a writing with the Company on a form provided by the Company representing that they have already implemented or will be implementing alternative DSM programs. Certifications shall be valid until withdrawn. If a Customer should choose to participate in one or more DSM programs for any account prior to or after the issuance of Commission Order No. 2013-826, then such Customer will not be permitted to opt-out of DSM programs and recovery of DSM costs for that account(s) for a period of three (3) years from the date the Customer accepts a DSM rebate from the Company.
5. Customers who opt-out but later elect to participate in one of the Company's programs may do so upon application to the Company. If acceptable to the Company, the Customer may participate in the Company's programs for any account(s), but may not apply to opt-out for that account(s) again for a period of three (3) years from the date the Customer accepts a DSM rebate from the Company.

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Rate 3 – Municipal Power Service, Rate 9 – General Service, Rate 10 – Small Construction Service, Rate 11 – Irrigation Service, Rate 12 – Church Service, Rate 13 – Municipal Lighting Service, Rate 14 – Farm Service, Rate 16 – General Service Time-Of-Use, Rate 22 – School Service, Rate 28 (Experimental) – Small General Service Time-Of-Use Demand

Medium General Service:

Rate 15 - Supplementary and Standby Service, Rate 20 – Medium General Service, Rate 21 – General Service Time-Of-Use Demand, ~~Rate 21A – Experimental Program – General Service Time-Of-Use Demand~~

Large General Service:

Rate 23 – Industrial Power Service, Rate 24 – Large General Service Time-Of-Use, Rate 27 - Large Power Service Real Time Pricing (Experimental)

SALES AND FRANCHISE TAX

To the above will be added any applicable sales tax, franchise fee or business license tax which may be assessed by any state or local governmental body.

PAYMENT TERMS

All bills are net and payable when rendered.

TERM OF CONTRACT

The contract terms will be the same as those incorporated in the rate tariff under which customer receives electric service.

GENERAL TERMS AND CONDITIONS

The Company's General Terms and Conditions are incorporated by reference and form a part of this rider.

Exhibit 10

**Dominion Energy South Carolina (DESC)
Application of ORS-provided Net Found Revenue Decision Tree**

The Company evaluated its operations for activities directly or indirectly that would result in an increase in existing customers' demand or energy consumption within the company service territory. Three main areas considered during the review included economic development, electric vehicles, and lighting. No such activities were determined to produce found revenues during the program year. Although DESC offers an Economic Development Rider (EDR) as a potential source of increased sales and demand, this EDR was approved by the Commission in Order No. 2019-375 and provides incentives for customers to locate or expand their operations within the Company's service territory.

With respect to the implementation of the EDR, DESC has determined that three contracts have been executed for new customers under the EDR that located operations in its service territory and one contract for an existing customer were executed during the program year. When applying the decision tree found below, all increases in customer demand and energy consumption resulting from a Commission-approved economic development rate, as listed in Box 4, shall be excluded for the purposes of determining found revenues.

Accordingly, and in compliance with Commission Order No. 2019-880, the Company has not identified any found revenues to report with this filing.

Below is a copy of the Net Found Revenue Decision Tree.

Net Found Revenues Decision Tree¹

